POTOMAC
AIRFIELD VKX

Bruce Lundegern SBA office of advocacy
Scot Stone, FCC

Amendment of the Commission's Rules to Promote Aviation Safety Notice of Proposed Rulemaking
WT Docket No. 19-140 Section 4

Good Morning!

As progenitor of various Federal NPRMS and policy, including FAA and FCC, I heartily applaud any reduction in unnecessary regulatory 'interference' (that's an FCC pun).

My comments as follows:

> **2. Audio Visual Warning Systems (Clever!)**
>
> 16. The Advisory Circular provides that the audible warning feature is optional rather than mandatory, but it sets forth requirements regarding the content and duration of the warning.36 Specifically, the audible warning must be activated when an aircraft is within one-half nautical mile horizontally and 500 feet vertically of the obstruction. It is repeated three times or until the system…
>
> We propose to amend our rules to address the Advisory Circular and to facilitate the licensing of Aircraft Detection Lighting Systems, which serve the public interest by reducing the impact of nighttime lighting on nearby communities and migratory birds, reducing energy consumption, and extending the life expectancy of obstruction lights.
>
> ***We seek comment on whether the proposed relaxation of the duty cycle limits would pose a significantly greater risk of interference to other communications.***

To minimize interference beyond the immediate area, I recommend the transmitter's radiated power be limited to only impact operators within relevant range; perhaps ½ watt on the VHF or less?

I can only wonder how pilots are to know what frequency to monitor….? Or how to anticipate or interpret such warnings? "Pull up?" This may or may not be practical, but let it be tried. Did the proponent go through a test or evaluation program under STA to see what actually happens in the real world? Just curious.

> **3. Aeronautical Mobile (Route) Service Systems in the 108-117.975 MHz and 960-1164 MHz Bands**
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> To implement the provisions that are specific to the 108- 112 MHz sub-band, the Commission could limit the use of the band to Ground-Based Augmentation Systems.

GBAS is the system used for local enhancement of GPS satellites: As fixed references on the surface to augment local satellite precision, and as correction feed to the overhead satellite network.

There is a LOT of concern regarding GPS vulnerability. A strong localized GPS source on the surface is an excellent idea for redundancy. Has integrity and security of these potential backup signals been considered? As a correction signal to the network overhead, could they open a door to intentionally mis-aligning the network overhead with false corrections?

https://www.faa.gov/about/office_org/headquarters_offices/ato/service_units/techops/navservices/gnss/laas/howitworks/

4. Aeronautical Advisory (Unicom) Stations

Eligibility for the unicom license at such an airport is restricted to State or local government entities and to nongovernmental organizations that are authorized to apply for the license by a State or local government entity whose primary mission is the provision of public safety services. We propose to clarify that this eligibility restriction applies only at public-use airports, and that unicom stations serving private airfields or helipads (such as at a hospital or offshore oil platform) that do not have a published common traffic advisory frequency do not need State or local government approval.61 The Commission does not appear to have considered such airports62 when it adopted the requirement,63 and we see no reason to apply it to the owner or operator of a private airfield or helipad.

YES – Correct, there are MANY privately-owned public and private use airports. It is my understanding the airport owner or authority, public or private, *already has pre-emptive authority to apply for a station license*, with or without local gov approvals? Clarity on this could not hurt!

We propose to revise the rule to specify that unicom stations at airports with "a control tower or FAA flight service station that operates at all times when the airport is used by aircraft for takeoff or landing"67 must use 122.950 MHz. This would clarify that 122.950 MHz is designated for use at all airports where the control tower or FAA flight service station is in operation at all times when the airport is open, including airports that do not operate continuously.

We invite comment on this proposal, and on alternative criteria. For example, should application of the rule be further expanded (by, for example, considering remote communications outlets, as the rules do with respect to whether more than one unicom is permitted at a particular airport) or should it be expanded in a more limited manner (by requiring unicom use of frequency 122.950 MHz only at airports that operate a minimum number of hours each day)? We also seek comment on the costs and benefits of expanding the use of frequency 122.950 MHz by unicom stations.

Standardizing Unicom to 122.950 at towered airports makes sense: Arriving at a towered airport a pilot clears the runway and is then told by Tower to 'go to unicom.' At airports with multiple FBOs (service providers) they may share that Unicom frequency, or each have its own. Whoever gets the pilots attention gets to sell them fuel and services, making 'unicom' a potentially contentious matter. The airport's Unicom could be co-operatively shared by multiple users, or each have its own frequency. Let the airport authority decide.

As progenitor of FCC 87.219 ('Automated Unicom'), I think/hope I understand licensing better than most, but clarity from FCC wouldn't hurt. Unicom 'licensing' is often very confusing to people, because it is a 'class' of service, as well as a spectrum license: A ***station*** licensee is given by FCC authority over the use of a given designated frequency at a given location (under the airport's authority, which may be the airport or those the Airport authorizes to hold the Unicom license). Transmitters operating under that existing authority do not each need redundant station licenses. However, each physical radio DOES require a device license, which certifies the device performance within its design spectrum. If multiple operators can cooperatively share 'the' Unicom frequency, excellent. If they fight with each other over it, with the airport's permission let them get their own. Any clarity on that matter would be helpful.

David Wartofsky
Potomac Airfield (KVKX)
Tel (301) 248-5720
Email bigcheese@potomac-airfield.com